

Shropshire Local Plan 2016-2038

Stage 2 - Hearing Statement

Matter 3 – Housing Land Need, Requirement and Supply

Land at Boraston Drive and the A456, Burford

Prepared by Fisher German on behalf of Lone Star Land

Project Title

Land adjoining Boraston Drive and north of A456, Burford

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1. Introduction

1.1 This Hearing Statement has been prepared by Fisher German on behalf of Lone Star Land in respect of their land interests at adjoining Boraston Drive and north of A456, Burford as illustrated at Figure 1 below.



Figure 1: Land adjacent to Boraston Drive and the A456, Burford

1.2 The land is a proposed housing allocation within the emerging Local Plan under Reference BUR004, within Schedule S10.2(i) – Residential Site Allocations: Community Hubs in the Ludlow Place Plan Area for 100 dwellings.

1.3 The proposed allocation is supported and Lone Star Land and the landowners remain fully committed to the residential development of the site.

2. MIQs

The Housing Need

1. In response to previous questions posed by us and discussions at the stage 1 hearing sessions, the Council have provided reasons why they consider the base date of the Plan should remain as 2016 (GC24). We note that the base date of 2016 has been used for the purpose of calculating the requirement for the plan period. Is this correct or should it be when LHN was calculated (2020)? If a base date of 2020 is used how would this affect the housing need, requirement and supply?

- 2.1 The Council's response provided at CG45 4.3, considers whether the adopted approach to the base date of the Plan is inherently unsound and whether amendments are required as a matter of integral Plan soundness. Whilst Lone Star Land agree that there is an element of neatness in aligning the Plan period with the date of the Housing Needs Assessment, we do not believe that the approach the Council has currently adopted fails any of the tests of soundness and thus remains a viable mechanism for the formulation of the Plan period.

The Housing Requirement

1. Is the approach to calculating the housing growth and the housing requirement set out in the Council's Updated Housing and Employment Topic Paper – April 2024 (GC45) of a minimum of 31,300 dwellings over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

- 2.2 The PPG allows a Local Authority to rely on a calculated Local Housing Need figure as established through the Standard Method for a period of 2-years "from the time the Plan is submitted to the Planning Inspectorate for examination" (Paragraph: 008 Reference ID: 2a-008-20190220). The Plan was submitted for examination on 3 September 2021, meaning that the grace period allowed by the PPG has expired.
- 2.3 The Shropshire Council Local Housing Need Assessment (August 2020) works through the Standard Method and establishes a Local Housing Need of 1,177 units per annum. This is however uplifted to 1,423 units per annum, as detailed in the Employment Topic Paper – April 2024 (GC45), accounting for a 15% uplift from Local Housing Need, plus a further 1,500 dwelling contribution towards forecast unmet needs emanating in the Black Country.

- 2.4 The 15% uplift was selected from a range of alternative options including a 5%, 10% and 15% increase in Local Housing Need. 15% was chosen to ensure delivery of the Local Housing Need requirement, but also to provide “some flexibility to respond to changes to local housing need over the plan” and a range of other perceived benefits including the ability to respond to sustainable development opportunities, increase housing affordability, support for the delivery of older peoples accommodation, support for the diversification of the labour force and wider economic growth aspirations the Council wishes to achieve.
- 2.5 This approach is highly pragmatic and inherently pro-growth and development, as contingency would normally be provided in increases to supply, not an increase to the housing requirement. Given a key aim and focus of the NPPF is to boost significantly the supply of housing this is an action in full accordance with that goal. Increasing the housing requirement means that the Council will need to use this for the demonstration of 5-year housing land supply for example, which obviously is not the case where only supply is uplifted.
- 2.6 The PPG (Paragraph: 010 Reference ID: 2a-010-20201216) sets out a range of reasons where increasing the housing requirement from base Local Housing Need would be appropriate, though is not fully exhaustive. We consider the approach adopted by Shropshire is in accordance with the NPPF/PPG.
- 2.7 Crucially the approach adopted provides contingency for fluctuations in Local Housing Need, and essentially provides a buffer which protects the Plan’s requirement from becoming out of date. If Local Housing Need decreases, or increases to a level within that 15% uplift, then the Plan’s proposed requirement is still considered robust. We have calculated the Local Housing Need using the Standard Method utilising a 2024 base date and the latest affordable housing ratio, resulting in a local housing need of 1,070 dwellings. As this is a reduction, the submitted requirement remains robust and above Local Housing Need, which is a minimum threshold.

The Overall Supply of Housing

2. Is the housing trajectory and information required by the tables appended to our initial questions (ID1) showing the expected rate of delivery of housing land up to date?

- 2.8 It would be beneficial, for the Plan’s clarity, for the trajectory to be included in the Plan as an appendix; albeit ultimately we have no objection to it forming an Examination/evidence document, so long as it is kept permanently available on the Council’s website. The Council should keep an updated trajectory under review through documents such as the AMR and 5-year housing land

supply statements, to enable critical assessment of the performance of the Plan against the delivery assumptions on an ongoing basis following adoption.

4. How will the supply and delivery of housing to meet the identified unmet needs of the Black Country be undertaken? Does this need identifying separately in a trajectory i.e. the expected delivery on the sites (BRD030, SHR060 and IRN001), identified to meet the unmet needs on a yearly basis.

- 2.9 We do not consider that there is a separate requirement to provide a trajectory for the unmet need sites. This is not an approach which has been enforced for other Local Plans which have had to respond to unmet needs that we have been involved in (albeit those examples tended to be within the same established HMA). The Council have provided a list of the sites they consider are functionally likely to meet unmet need, we do not believe that this needs to be disaggregated further.
- 2.10 It would seem overly prescriptive and bureaucratic for the Council to separate Shropshire's sites and those sites theoretically contributing to unmet need, as ultimately those living in Shropshire as a result of the lack of availability in the Black Country would not be restricted just to those sites, even if they are the most logical sites for that purpose in terms of proximity and accessibility, as house purchase will be informed by a range of factors, including price, character, schooling, property type, etc.
- 2.11 The Council will be required to measure its performance and supply utilising its housing requirement in totality, and the Council has a duty to meet that requirement fully, with the presumption in favour applicable if it falls below thresholds of supply or delivery. There is no requirement for separate trajectories, as the Council will not be measured on that basis in practice. Whilst it may be considered useful for monitoring purposes, so long as the Council has met its housing requirement, the application of the absorption of that need in principle means it has fulfilled its duty to provide sufficient housing to meet both its own need and unmet needs. Any argument that there should be a requirement for the Council's supply to be tested separately is not supported, as that ultimately suggests that one of those requirements was more important than the other. Our firm view is housing need, be that Shropshire's or that emanating from the Black Country, is of equal importance. Once unmet need has been assimilated into Shropshire housing requirement, as would be done through this Plan, it becomes the Council's responsibility to meet this in full and without regard for the source of that need.

5. Does the Plan identify a developable supply and/or broad locations in years 6-10 and, where possible, years 11-15 necessary to maintain continuity of deliverable supply, including an appropriate buffer for changing circumstances?

- 2.12 Yes, the Council provides allocations which are a developable supply which will deliver in years 6-10 and years 11-15, i.e.. later in the Plan period. We consider the Council has advanced a Plan with a range of site typologies which ensure that supply exists throughout the proposed remaining Plan period.
- 2.13 Turning to the Council's housing trajectory (Draft Shropshire Local Plan 'Snapshot' Housing Trajectory for Shropshire Data to: March 2023 – Table 1), it is clear that whilst there is a pattern of slightly declining annual housing delivery as the Plan advances, this is not entirely unexpected and we believe represents a more healthy, deliverable composition than those Plans who see the inverse (increasing supply as the Plan goes on). The reason this composition is preferred is it sees frontloaded delivery and thus greater confidence the Plan will deliver its adopted requirements over the Plan period in full. It complies with the aim of boosting the supply of housing and also accords with the aims of the new Labour administration which is seeking to expedite delivery in this parliament.
- 2.14 Too regularly we see Plans seek to push growth back to the end of the Plan period, often proposing to deliver the majority of growth in the latter years of the period. This results in delayed delivery and potentially undeliverable levels of need. There is little to prevent Plans who adopt such an approach to then subsequently revisit the requirement through Plan review, seeking to reduce needs or again pushing needs back. One need only look at Bedford who after being allowed to push ahead with a Plan which was acknowledged by the Inspector's to be deficient (Bedford LP 2030), with an immediate review requirement, to then submit a Plan with a proposed stepped trajectory delivering significant volumes of growth at the back end of that Plan period (Bedford LP 2040). Early Plan delivery is entirely beneficial and should be encouraged.
- 2.15 It is also difficult, and unwelcome, for Councils to try and artificially control housing supply to achieve a more consistent rate of housing growth. The only way this should be attempted to be achieved is through supply composition, which is the approach proposed here, however even then there is no plausible way this can be assured to deliver consistent annual delivery. Sites such as the Council's larger strategic allocations are naturally suited to meeting needs towards the end of the Plan period, but much of the supply allocated will be sites that will be suited to immediate, early

delivery in the Plan period such as the land at Burford, however for the reasons set out above this should not be considered unwelcome subject to a sufficient level of anticipated delivery later in the Plan period.

- 2.16 Moreover, the requirement for 5-year Plan reviews (or immediate reviews as discussed in response to Matter 25) ensures the Council has to pragmatically consider the Plan on a regular basis, and thus if expedited delivery is deemed to be a symptom of higher than previously anticipated housing need, this can be positively explored and reflected moving forward, and also enables the delivery of new immediate allocations if required.